

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195-SHS

**NOTICE OF MOTION AND  
MOTION FOR LEAVE TO FILE  
SECOND AMENDED  
COMPLAINT**

Please take notice that upon the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of Plaintiff The New York Times Company (“The Times”), before the Honorable Sidney H. Stein in Courtroom 23A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 15 granting The Times leave to file its Second Amended Complaint (“SAC”).

Dated: April 15, 2025

/s/ Ian Crosby

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